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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 MATTHEW MICHAEL HANSEN,  
15 Defendant.

Case No. 2:19-mj-969-DJA

**STIPULATION TO CONTINUE  
BENCH TRIAL**  
(First Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
18 Trutanich, Special United States Attorney, and Rachel Kent, Assistant United States Attorney,  
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
20 and Andrew Wong, Assistant Federal Public Defender, counsel for Matthew Michael Hansen,  
21 that the bench trial currently scheduled on March 18, 2020 at 9:00 am, be vacated and continued  
22 to a date and time convenient to the Court.

23 This Stipulation is entered into for the following reasons:

- 24 1. On March 3, 2020, Mr. Hansen filed a motion to dismiss counts one and two of  
25 the criminal complaint.  
26

2. Briefing on the motion will not be completed by the currently set trial date of March 18, 2020.

3. The parties agree that a continuance is necessary to fully brief the issues and for the Court to adjudicate the motion to dismiss.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code § 3161(h)(7)(B)(iv).

This is the first request for a continuance of the bench trial.

DATED this 9<sup>th</sup> day of March, 2020.

RENE L. VALLADARES  
Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

*/s/ Andrew Wong*  
By \_\_\_\_\_

*/s/ Rachel Kent*  
By \_\_\_\_\_

ANDREW WONG  
Assistant Federal Public Defender

RACHEL KENT  
Special Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MATTHEW MICHAEL HANSEN,

7 Defendant.

Case No. 2:19-mj-969-DJA

FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER

9 **FINDINGS OF FACT**

10 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
11 Court finds that:

- 12
- 13 1. On March 3, 2020, Mr. Hansen filed a motion to dismiss counts one and two of the  
14 criminal complaint.
  - 15 2. Briefing on the motion will not be completed by the currently set trial date of March  
16 18, 2020.
  - 17 3. The parties agree that a continuance is necessary to fully brief the issues and for the  
18 Court to adjudicate the motion to dismiss.
  - 19 4. Additionally, denial of this request for continuance could result in a miscarriage of  
20 justice. The additional time requested by this Stipulation is excludable in computing the time  
21 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,  
22 United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United  
23 States Code §§ 3161(h)(7)(B) and 3161(h)(7)(B)(iv).

24 This is the first request for a continuance of the bench trial.

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